

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MUSTAFA HUSSEIN,	)	
	)	
Plaintiff,	)	
	)	Cause No. 4:14cv-1410 JAR
v.	)	
	)	
ST. LOUIS COUNTY, MISSOURI, et al.,	)	
	)	
Defendants.	)	

ANSWER OF DEFENDANT ST. LOUIS COUNTY, MISSOURI

COMES NOW St. Louis County, Missouri (“County”) and for its responsive pleading to the Complaint answers as follows:

*Introductory paragraphs*

1. County makes no responsive pleading to Paragraph 1 of the Complaint.
2. County DENIES Paragraph 2 of the Complaint.
3. County makes no responsive pleading to Paragraph 3 of the Complaint.

*Jurisdiction and venue*

4. County ADMITS Paragraphs 4 through 7 of the Complaint.

*Parties*

5. County lacks sufficient knowledge and information to form a belief as to the veracity of Paragraph 8 of the Complaint, and so DENIES it.
6. County admits it is a political subdivision of the State of Missouri, but DENIES the remainder of the allegations in Paragraph 9 of the Complaint.
7. County makes no responsive pleadings to the allegations of Paragraphs 11 and 12, as not directed against it.

8. County *DENIES* the allegations of Paragraph 12 of the Complaint.

*Facts* (the enumerated paragraphs of Count I do not follow numerically the paragraphs preceding them in the Complaint; County nonetheless refers to them herein as they appear in the Complaint.)

9. County repeats its responsive pleadings to the earlier numbered paragraphs of the Complaint.

10. County *DENIES* the allegations of Paragraphs 22 through 24 of the Complaint.

11. As its *AFFIRMATIVE DEFENSE*, County states that any act of County alleged in the Complaint, and any act of St. Louis County police officers alleged in the Complaint, were performed at the direction and under the control of the Missouri State Highway Patrol acting pursuant to executive orders issued by the Governor of the State of Missouri (specifically, Executive Orders 14-08 and 14-09), such executive orders issued pursuant to Sections 44.010 through 44.130 R.S.Mo., and that any policies which may have aggrieved Plaintiff were not the policies of St. Louis County, but of the State of Missouri.

WHEREFORE, County asks that the Complaint be dismissed as to County; that no injunctive or declaratory relief, nor any other relief sought by Plaintiff be ordered against it; and further asks for such other relief as the Court deems appropriate in the circumstances.

PATRICIA REDINGTON  
COUNTY COUNSELOR

By: s/s  
Michael A. Shuman #MO32418  
Associate County Counselor

Lawrence K. Roos Bldg.  
41 So. Central Avenue  
Clayton, MO. 63105  
314-615-7042; Fax 314-615-3732  
Mshuman@stlouisco.com

A copy of Defendant St. Louis County's Answer was filed electronically with the PACER system operated by the United State District Court for the Eastern District of Missouri, on September 3, 2014.

s/s  
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Michael A. Shuman